

**CPNI COMPLIANCE CERTIFICATE**

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

**Annual 64.2009(e) CPNI Certification for:** 2015 covering the prior calendar year 2014

**Date Filed:** January 9, 2015

**Name of Company covered by this certification:** The Electric and Water Plant Board of the City of Frankfort, Kentucky ("FPB")

**Form 499 Filer ID:** 821040

**Name of signatory:** Milton Hance Price

**Title of signatory:** Staff Attorney

I, Milton Hance Price, certify that I am Staff Attorney and an officer of FPB, and acting as an agent of FPB, that I have personal knowledge that FPB has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification as Attachment 1 is an accompanying statement explaining how FPB's procedures ensure that FPB is in compliance with the requirements set forth in Section 64.2001 *et seq.* of the Commission's rules.

FPB has not taken any actions against data brokers in the past year.

FPB has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

FPB represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. FPB also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: Milton Hance Price  
Milton Hance Price

ATTACHMENT 1  
TO CPNI COMPLIANCE CERTIFICATE

Statement Regarding CPNI Operating Procedures

FPB's written CPNI Operating Procedures ensure that FPB will be in compliance with 47 U.S.C. § 222 and the rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations. Included among the provisions of FPB's CPNI Operating Procedures are:

- A requirement that FPB have at all times a CPNI Compliance Supervisor to supervise the implementation of FPB's CPNI Operating Procedures.
- Detailed procedures for safeguarding CPNI, including procedures for customer authentication and password protection of CPNI.
- Detailed procedures for determining what type of customer approval is necessary for use, disclosure and access to CPNI.
- A requirement that the billing system records for customers' accounts allow the status of the customer's CPNI approval to be easily ascertained.
- A requirement that personnel be trained as to when they are and are not authorized to use CPNI.
- A written disciplinary process for misuse of CPNI.
- Detailed filing, notice and recordkeeping requirements.
- Detailed procedures to be followed in the event of a breach of CPNI.

FPB does not use CPNI for marketing purposes.